



THE CITY OF NEW YORK
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February 3, 2017

BY ECF

Honorable Judge Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Anthony Vega v. Greiner, et al., 15-CV-5585 (RJD) (RML)

Dear Judge Levy:

I am the Assistant Corporation Counsel assigned to the defense of this matter on behalf of defendants. Defendants write to respectfully request a 30-day extension of time to complete discovery, from February 7, 2017 until March 7, 2017. Should the court grant this request, defendants also request that the status conference currently scheduled for February 7, 2017 at 2:00 PM be adjourned until after discovery is complete, and scheduled at the Court's convenience. This is defendants' third request to extend discovery, and plaintiff's counsel kindly consents to this application.

As Your Honor is aware, I was recently reassigned to this case on January 19, 2017 (Dkt. 29). Over the past two weeks, the undersigned has spent a significant amount of time becoming familiar with the facts of the case and reviewing the significant amount of paper discovery that has been exchanged. Given the recent reassignment, the need to conduct further assessment of the case, and the outstanding depositions, the parties will be unable to complete fact discovery by the current deadline. Accordingly, the additional time will allow the parties to continue to effectively litigate the case and complete any outstanding fact discovery.

Significantly, the parties have recently had meaningful settlement discussions, and will continue their efforts to resolve the case.

For the foregoing reasons, defendants respectfully request a 30-day extension of time to complete discovery, from February 7, 2017 until March 7, 2017, and a corresponding adjournment of the status conference currently scheduled for February 7, 2017.

Thank you for your consideration of these requests.

Respectfully submitted,

/s/

Matthew Stein
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
Baree Fett, Esq.